

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION

CR223-0003

UNITED STATES OF AMERICA

) INDICTMENT NO.

1

) 18 U.S.C. § 922(a)(6)

-) False Statement During Purchase of a Firearm

1

) 18 U.S.C. § 924(a)(1)(A)

11

DESIRAE HEINSLER

1) Purchase of a Firearm

THE GRAND JURY CHARGES THAT:

COUNT ONE

False Statement During Purchase of a Firearm

18 U.S.C. § 922(a)(6)

U.S. DISTRICT COURT

On or about July 20, 2020, in Jeff Davis County, within the Southern District of Georgia, the Defendant,

DESIRAE HEINSLER.

in connection with the acquisition of firearms, did knowingly make false and fictitious written statements to Sellers Feed & Seed Inc., a licensed dealer of firearms within the meaning of Chapter 44 of Title 18 of the United States Code, which statement was intended and likely to deceive Sellers Feed & Seed, as to a fact to the lawfulness of the sale of the firearms, in that Defendant falsely represented that she was the actual buyer of the firearms, to wit: a Springfield Model 911, .38 caliber pistol; a Springfield Model EMP, 9mm pistol; and a Keltec, Model P3, 9mm pistol, when, in fact, as Defendant then and there well knew, Defendant was not the actual buyer of the firearms.

All in violation of Title 18, United States Code, Section 922(a)(6).

COUNT TWO
False Statement During Purchase of a Firearm
18 U.S.C. § 922(a)(6)

On or about July 30, 2020, in Jeff Davis County, within the Southern District of Georgia, the Defendant,

DESIRAE HEINSLER,

in connection with the acquisition of firearms, did knowingly make false and fictitious written statements to Sellers Feed & Seed Inc., a licensed dealer of firearms within the meaning of Chapter 44 of Title 18 of the United States Code, which statement was intended and likely to deceive Sellers Feed & Seed, as to a fact to the lawfulness of the sale of the firearms, in that Defendant falsely represented that she was the actual buyer of the firearms, to wit: two German Sports Gun Model GERM 2210FF, .22 caliber pistols; a FMX Model 9C, 9mm pistol; and a Ruger Model EC9s, 9mm pistol, when, in fact, as Defendant then and there well knew, Defendant was not the actual buyer of the firearms.

All in violation of Title 18, United States Code, Section 922(a)(6).

COUNT THREE

False Statement During Purchase of a Firearm
18 U.S.C. § 922(a)(6)

On or about August 7, 2020, in Jeff Davis County, within the Southern District of Georgia, the Defendant,

DESIRAE HEINSLER,

in connection with the acquisition of firearms, did knowingly make false and fictitious written statements to Sellers Feed & Seed Inc., a licensed dealer of firearms within the meaning of Chapter 44 of Title 18 of the United States Code, which statement was intended and likely to deceive Sellers Feed & Seed, as to a fact to the lawfulness of the sale of the firearms, in that Defendant falsely represented that she was the actual buyer of the firearms, to wit: a Keltec Model PF-9, 9mm pistol; an EAA Model EARB, .38 special revolver; a Bearman Model BBG95B, 9mm pistol; a Diamondback Model VK9888, 9mm pistol; and a Keltec Model P11, 9mm pistol, when, in fact, as Defendant then and there well knew, Defendant was not the actual buyer of the firearms.

All in violation of Title 18, United States Code, Section 922(a)(6).

COUNT FOUR

False Statement During Purchase of a Firearm
18 U.S.C. § 922(a)(6)

On or about February 5, 2021, in Jeff Davis County, within the Southern District of Georgia, the Defendant,

DESIRAE HEINSLER,

in connection with the acquisition of firearms, did knowingly make false and fictitious written statements to Sellers Feed & Seed Inc., a licensed dealer of firearms within the meaning of Chapter 44 of Title 18 of the United States Code, which statement was intended and likely to deceive Sellers Feed & Seed, as to a fact to the lawfulness of the sale of the firearm, in that Defendant falsely represented that she was the actual buyer of the firearm, to wit: a North American Arms NAA22, .22 caliber revolver and a Keltec Model CP33, .22LR pistol, when, in fact, as Defendant then and there well knew, Defendant was not the actual buyer of the firearms.

All in violation of Title 18, United States Code, Section 922(a)(6).

COUNT FIVE

False Statement During Purchase of a Firearm
18 U.S.C. § 922(a)(6)

On or about July 24, 2021, in Jeff Davis County, within the Southern District of Georgia, the Defendant,

DESIRAE HEINSLER,

in connection with the acquisition of firearms, did knowingly make false and fictitious written statements to Sellers Feed & Seed Inc., a licensed dealer of firearms within the meaning of Chapter 44 of Title 18 of the United States Code, which statement was intended and likely to deceive Sellers Feed & Seed, as to a fact to the lawfulness of the sale of the firearms, in that Defendant falsely represented that she was the actual buyer of the firearms, to wit: a Walther Arms Model P22, .22 caliber pistol; a Taurus Model G3C, 9mm pistol; and a SCCY Model CPX-2, 9mm pistol, when, in fact, as Defendant then and there well knew, Defendant was not the actual buyer of the firearms.

All in violation of Title 18, United States Code, Section 922(a)(6).

COUNT SIX

False Statement During Purchase of a Firearm
18 U.S.C. § 924(a)(1)(A)

On or about February 5, 2021, in Jeff Davis County, within the Southern District of Georgia, the defendant,

DESIRAE HEINSLER,

knowingly made a false statement and representation to Myron Sellers, D/B/A/ Sellers Feed & Seed, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Myron Sellers, in that the Defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, attesting to the effect that she was actual buyer of firearms, to wit: a North American Arms Model NAA22, .22 caliber revolver and a Keltec Model CP33, .22LR pistol, whereas in truth and in fact, she was acquiring said firearms on behalf of another person.

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

FORFEITURE ALLEGATIONS

The allegations contained in Count through Six of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

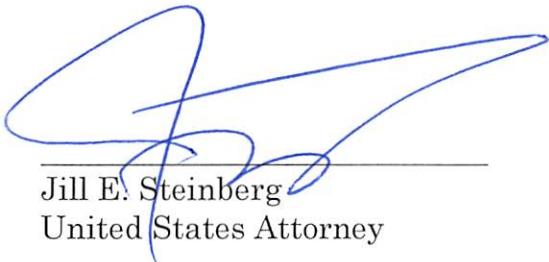
Upon conviction of one or more of the offenses alleged in Counts One through Six of this Indictment, the Defendant, **DESIRAE HEINSLER** shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearm and ammunition involved in the commission of the offense(s), including, but not limited to: Armscor Model 1911 .45 caliber pistol (Serial Number RIA2179743) and a North American Arms Model NAA22 .22 caliber revolver (Serial Number MOM200191).

If any of the property described above, as a result of any act or commission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A True Bill.



Jill E. Steinberg
United States Attorney



Jennifer J. Kirkland
Assistant United States Attorney
*Lead Counsel



Patricia G. Rhodes
Assistant United States Attorney
Chief, Criminal Division